

# Consultation on Changes to Air Traffic Arrangements

By Ron Brent – Aircraft Noise Ombudsman

*(The Australian Government appointed Ron Brent as Australia's first Aircraft Noise Ombudsman in 2010, to help improve the handling of complaints about aircraft noise, the information about aircraft noise and consultation about changes in air traffic that will alter the impact of aircraft noise. The views expressed in the article below are those of Ron Brent, as Aircraft Noise Ombudsman. They are not necessarily the views of the Government or of Airservices Australia or any other government agency.)*

Currently Airservices Australia (Airservices) is considering significant changes to flight paths for both Perth and Gold Coast airports. In this context it is worthwhile for me to set out my expectations for what should be included in the consultation that accompanies these proposals.

## **General Principles**

It is very difficult to get consultation right. If it is begun very early it can lead to misinformation and unnecessary alarm because it will have to be based on speculation about the nature of a change. If it is left until after some level of planning has taken place it can lead to criticism that it is too late and that concepts have already been settled.

In my view effective consultation cannot take place until some level of planning has put some shape around a proposal, but must occur before it is too late to alter those plans. Consultation must include the opportunity for plans to be carefully considered, views to be offered, and if those views require changes to or halting of the plans, decision makers must seriously consider those options.

Consultation must include an opportunity to influence the outcome and to change plans, but it is not a right to determine the result.

## **Gold Coast ILS Proposal**

Currently Airservices is conducting consultations on a proposal for a new instrument landing system (ILS) for Gold Coast airport. The new ILS would require aircraft using it to fly on a new approach to Gold Coast airport over a substantial number of homes that currently don't have aircraft flying directly overhead.

## **Gold Coast Runway 14 Departure Trial**

Airservices is also conducting a trial of revised arrangements for some of the departures from runway 14 at Gold Coast airport. These are the departures to the south and the change seeks to put more of the flight path over the golf course that is already partly under those departures.

## **Perth Air Traffic Change Proposal**

Airservices is also in the early stages of consulting the public about possible changes to air traffic arrangements on three flight paths over Perth. The intention of these changes is to provide an overall reduction in the impact of aircraft noise over Perth. The changes are complex and involve three separate but linked changes.

### **Consultation Processes in the Gold Coast and Perth**

The changes for these two airports require open, honest and thorough consultation.

In the ANO Charter, my explicit powers and duties include “monitoring and reporting on the effectiveness of Airservices’ ... community consultation processes on Aircraft Noise-related issues” (Clause 9 c) of my Charter). I am therefore monitoring closely the consultation occurring for the Gold Coast ILS, Gold Coast runway 14 and the Perth noise improvement proposals.

In conducting the necessary consultation Airservices should not promote the proposals, nor should it criticise them. Instead Airservices must present them impartially, taking all reasonable steps to ensure that the public understands the potential implications (good and bad).

Airservices must make every reasonable effort to inform the public, including active measures to bring the consultation to the public, rather than waiting for the public to come to the consultation. It must also use past experience of the low level of responses to such consultation exercises to interpret the level of response. It must ensure that, when it reports the outcome of the consultation, the decision makers clearly understand that a small number of responses might nevertheless reflect a much higher level of dissatisfaction or support and this may become apparent only after the change happens.

I have encouraged Airservices to work hard to make the public aware of the potential consequences of the change (the negative impacts as well as the benefits) and to give the consultation process a high profile. Past experience of changes to air traffic arrangements has highlighted how difficult it is for the public to understand the potential impact of new aircraft noise, especially in the case of those who have not been subject to any significant aircraft noise previously.

I must emphasise that the above comments are not intended as a criticism of the current consultation processes. Quite the contrary. The approach taken so far reflects a commitment to ‘best practice’ in consultation. Airservices added shopping centre displays to the original Gold Coast ILS consultation plans to try to address the challenges in bringing information about the changes into the awareness of some of those who will be affected.

As noted above, experience has shown that many of those who will find themselves adversely affected by aircraft noise will not participate in the consultation process. This may be because they do not appreciate how the changes will affect them, they consider that they have nothing to add, they feel that their views will not have any impact, or because they consider the benefits of the changes will outweigh the disadvantages. Whatever the reason, it is important to engage with as many members of the public as possible, and to report to decision makers in a way that accounts for

the various reasons that consultation so often fails to reach many of those who will be affected by a change.

### **Limits on Consultation**

It is always possible to do more consultation. It is important, therefore, to balance the resources, effort and indeed delay and complexity that can be required for consultation, against the significance of the change and the value of further effort. In every consultation process there will come a point when further effort will have limited value or indeed when some of the standard consultation processes will involve resources or delay that go beyond this reasonable balance. Unfortunately, there is no formula that can establish the appropriate level of effort.

In the case of the current Gold Coast and Perth proposals, significant levels of consultation are justified for those areas that will potentially experience significant changes in the impact of aircraft noise. In both cases I consider that the level of consultation (either underway or planned) as at the time of writing is appropriate. Given the significance of the changes I will continue to monitor the consultation processes, both in terms of how they are conducted and how they are reported to the decision makers.

### **Conclusion**

Consistent with my Charter obligation as set out above I am taking a close interest in the consultation processes in Perth and the Gold Coast. I will support any reasonable initiatives that can assist reaching the widest number of those who will be affected by the change. I will also work towards ensuring the decision makers received an accurate and balanced report on the results of the consultation process.

A handwritten signature in black ink, appearing to read 'Ron Brent', with a stylized flourish at the end.

Ron Brent  
Aircraft Noise Ombudsman

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